

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

TERRY DANIEL,

Plaintiff,

vs.

CIVIL ACTION NO.
CV-00-M-400-E

CITY OF LANETT FIRE and
EMS DEPARTMENT,

Defendant.

* * * * *

DEPOSITION OF TERRY L. DANIEL, taken
pursuant to stipulation and agreement before Danny
D. Tyler, Certified Shorthand Reporter and Notary
Public in and for the State of Alabama at Large, in
the Law Offices of Nix, Holtsford, Gilliland, Lyons
& Higgins, Suite 300, 300-A Water Street,
Montgomery, Alabama, on the 29th day of September,
2000, commencing at approximately 10:15 a.m.

* * * * *



1 who did you first ask about the job
2 description?

3 A. Chief Randy Brown. You are talking about
4 the first in 2000?

5 Q. Yes, sir.

6 A. Okay. Chief Brown.

7 Q. The November 1998 captain's position that
8 you applied for, Chief Cobb was still the
9 chief, correct, November 1998?

10 A. Yes, sir.

11 Q. And do you recall when he left?

12 A. I want to say he left this year, January
13 2000.

14 Q. Well, was he the chief when the February
15 2000 captain's position came open?

16 A. No, sir. February of 2000, no, sir. Chief
17 Randy Brown.

18 Q. How long have you known Chief Brown?

19 A. Since 1978.

20 Q. And how long, if you know, has he worked for
21 the City of Lanett?

22 A. Twenty-five years.

23 Q. Did you feel like he was qualified to become